

Tarter Krinsky & Drogin LLP 1350 Broadway New York, NY 10018 P 212,216,8000 F 212,216,8001 www.tarterkrinsky.com

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January 28, 2015

## BY FACSIMILE TRANSMISSION 212-805-7920

The Honorable Shira A. Scheindlin United States District Judge for the Southern District of New York 500 Pearl Street, Room 1620 New York, New York 10007

Re: United States of America v. Kenneth Starr, Case No. 1:10CR00520-01 (SAS)

In re Kenneth I. Starr, et al, Debtors, Chapter 7 Case No. 11-10219 (CGM)

Dear Judge Scheindlin:

Our firm is Substitute Special Litigation Counsel to Robert L. Geltzer, the Chapter 7 trustee (the "Trustee") of the debtors Kenneth I. Starr, Starr Investment Advisors, LLC and Starr & Company, LLC (the "Debtors") in the above-referenced substantively consolidated bankruptcy cases pending in the United States Bankruptcy Court for the Southern District of New York.

By way of this letter, we are requesting that Your Honor direct the limited unsealing of the list of victims in Kenneth Starr's above-referenced criminal case so as to make same available to the Trustee and his retained professionals, including his accountant and my firm as his special counsel, for use in connection with the Debtors' bankruptey cases. The Trustee and his retained professionals, including his accountant and his special counsel, are in the process of reviewing claims filed by various creditors in the Debtors' bankruptey cases. Based upon certain documentation and information reviewed during this process, it appears that some, if not all, of the victims who are entitled to restitution under the judgment entered by Your Honor in the criminal case and who have received restitution payments from the United States of American pursuant thereto, may also be creditors who have filed claims in the Debtors' bankruptey cases. In such event, the respective amounts which any of said creditors have received as restitution payments need to be deducted from the respective amounts of the claims (assuming such claims are allowed by the Bankruptey Court) that they have filed against the Debtors' bankruptey estate.

Accordingly, we respectfully request that Your Ilonor authorize the limited unscaling of the list of victims, and that such list be made available to the Trustee and to his retained professionals for the purposes set forth above.

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We previously have sent a draft of this letter to Michael Lockard, Esq., Assistant United States Attorney in the Southern District of New York, for his review, and on Monday, January 26, 2015, Mr. Lockard sent me an email communication indicating that the United States of America has "No objection to this request." Mr. Lockard is being sent a copy of this letter by electronic mail to michael lockard@usdoj.gov.

We thank Your Honor for your time and consideration respecting this matter.

Respectfully submitted,

Robert A. Wolf

Cc: Michael Lockard, Esq. (via email: Michael.lockard@usdoj.gov)

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